

In reaching a verdict, you must give separate and individual consideration to each claim made against each Defendant, and return a separate verdict for each of them. Each claim must be proven by a preponderance of the evidence. If you find one Defendant guilty of a claim, that does not necessarily mean that other Defendants are guilty as well.

Plaintiff's Proposed Instruction No. 31

\_\_\_\_\_ Objection  
\_\_\_\_\_ Agreed  
\_\_\_\_\_ Given  
\_\_\_\_\_ Given as Modified  
\_\_\_\_\_ Refused  
\_\_\_\_\_ Withdrawn

If you find one or more Defendants guilty, then you must determine the total damages Plaintiffs incurred.

During the trial, there was testimony from the Plaintiffs describing specific force used by specific officers. But in the description of some of the excessive force alleged, the Plaintiffs were not able to identify the specific officer who used excessive force.

Under the law of liability, if you find that one or more Defendants used excessive force, the Defendant(s) found guilty are liable for all the excessive force used during the incident by all of the officers, and resulting damages, even if the identity of the officer was not proven.

Plaintiff's Proposed Instruction No. 32

Watts v. Laurent, 774 F. 2d 168, 179 (7th Cir. 1985) ("Federal common law principles of tort and damages govern recovery under section 1983. It is axiomatic that where several independent actors concurrently or consecutively produce a single, indivisible injury, each actor will be held jointly and severally liable for the entire injury.")

\_\_\_\_ Objection  
\_\_\_\_ Agreed  
\_\_\_\_ Given  
\_\_\_\_ Given as Modified  
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